

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

JUDITH THIBEAU
and GEORGE THIBEAU,
Plaintiffs,

Docket No. 04-10643MLW

v.

UNITED STATES OF AMERICA
and EAST BOSTON NEIGHBORHOOD
HEALTH CENTER CORPORATION
Defendants.

2005 SEP 30 P 4:14
U.S. DISTRICT COURT
DISTRICT OF MASS.

PLAINTIFFS' EXPERT DISCLOSURE

Pursuant to Rule 26 of the Federal Rules of Civil Procedure plaintiffs offer a disclosure of their expected expert trial witnesses by reference to the attached exhibits A (report and resume of Herbert Eisenberg, AIA) and B (report and resume of Arthur Epstein, O.D., F.A.A.O.).

In addition to the information set forth in these exhibits, plaintiffs' attorney notes that Herbert Eisenberg charges \$120.00 per hour for his expert consultative services, has, as of 9/30/05 charged \$680.00 for consulting and preparing his report. Given this rate, plaintiffs anticipate incurring a cost of approximately \$750.00 to \$1,000.00 for further preparation and trial testimony of Mr. Eisenberg.

Furthermore, with regard to Dr. Epstein and his testimonial history over the last four years, Dr. Epstein has advised that he has offered testimony within the last four years, that he himself is not sure of the names of such cases and that his office is searching his records to determine such information; and, further, that he expects his office will be able to produce the names of such cases within three weeks.

Plaintiffs,
Judith and George Thibeau,
by their attorney,

~~James L. Frederick, Esq.~~
~~BBO #543597~~

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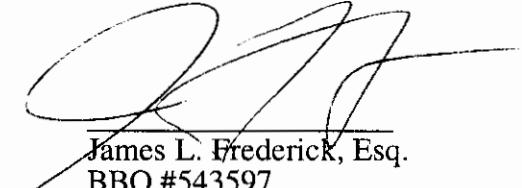
CERTIFICATE OF SERVICE

The undersigned attorney certifies that a Summons and copy of the Plaintiffs' Complaint were served upon the following parties, as required by Federal Rule of Civil Procedure, Rule 4(i),
VIA HAND DELIVERY to:

Christopher Alberto, Esq.
Assistant U.S. Attorney
United States Attorney for The District of Massachusetts
U.S. Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

Tory A. Weigand, Esq.
Charles M. Urso, Esq.
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250 Summer Street
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DATED: 9/30, 2005


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